

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re: BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff,

Plaintiff,

Adv. Pro. No. 10-04390 (CGM)

v.

BAM L.P., MICHAEL MANN, and MERYL  
MANN,

Defendants.

**DECLARATION OF LAN HOANG IN SUPPORT OF TRUSTEE'S  
OPPOSITION TO DEFENDANTS' MOTION IN LIMINE TO EXCLUDE  
THE TESTIMONY OF LISA COLLURA**

I, LAN HOANG, declare the following:

1. I am a Partner with the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard, as trustee ("Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the chapter 7 estate of Bernard L. Madoff.

2. I submit this Declaration in support of the Trustee's Opposition to Defendants' Motion *in Limine* to Exclude the Testimony of Lisa Collura.

3. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Lisa M. Collura, CPA, CFE, CFF, dated June 12, 2015, including Exhibits Nos. 1-3, and 7-10.

4. Attached hereto as Exhibit B are true and correct copies of excerpts of from the transcript of Lisa M. Collura's testimony during the May 8 and May 9, 2019 trial in *Picard v. Nelson*, Adv. Pro. Nos. 10-04377 (SMB), ECF Nos. 190, 191, 10-04658 (SMB), ECF Nos. 193, 194.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746(2).

Dated: September 4, 2020

By: /s/ Lan Hoang  
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